

EXHIBIT E

The Honorable Judge Marsha Pechman

**UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

TRAVIS MICKELSON, DANIELLE H.
MICKELSON, and the marital community
thereof,

Plaintiffs,

v.

CHASE HOME FINANCE, LLC, an unknown
entity; JPMORGAN CHASE BANK, N.A., a
foreign corporation; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., a foreign corporation; NORTHWEST
TRUSTEE SERVICES, INC., a domestic
corporation; JOHN DOES, unknown entities;
MORTGAGEIT, INC., a foreign corporation;
GMAC MORTGAGE CORPORATION, a
foreign corporation; CHICAGO TITLE, an
unknown corporation; ROUTH CRABTREE
OLSEN, P.S., a domestic Personal Services
Corporation; and FEDERAL HOME LOAN
MORTGAGE CORPORATION, a corporation,

Defendants.

No. C11-01445 MJP

**DEFENDANT ROUTH CRABTREE
OLSEN, P.S. RESPONSES TO
PLAINTIFFS' FIRST SET OF
INTERROGATORIES AND REQUESTS
FOR PRODUCTION**

COMES NOW, Defendant Routh Crabtree Olsen, P.S. ("RCO") and responds to
Plaintiffs Travis and Danielle Mickelson ("Plaintiffs") First Set of Interrogatories and Requests
for Production on Defendant RCO ("Requests") as follows:

I. PRELIMINARY STATEMENT

These responses are made solely for the purpose of this action. Each response and each
document produced is subject to all appropriate objections (including, but not limited to,

DEFENDANT RCO'S RESPONSES TO
PLAINTIFFS' INTERROGATORIES AND
RFPS.1 of 15 C11-01445 MJP

**ROUTH
CRABTREE
OLSEN, P.S.**

13555 SE 36th St., Ste 300
Bellevue, WA 98006
Telephone: 425.458.2121
Facsimile: 425.458.2131

1 RESPONSE: See the attached letters dated August 28, 2008 and August 6, 2010.

2
3 INTERROGATORY NO. 8: State whether or not you have any direct or indirect employment,
4 ownership, financial, or managerial relationship with defendant Northwest Trustee Services Inc.,
5 or any other defendant or defendant's attorneys. If the answer is yes, then explain in detail the
6 full nature and extent of such relationship, identify the name and address of all owners of any
7 equity interest, identify the names and officers or members of your corporation, identify any
8 employees who are also employed at Routh Crabtree Olsen, P.S., and specifically describe all
9 documents related to such relationships.
10

11 ANSWER:

12 RCO objects to Interrogatory No. 8 as it seeks irrelevant information not likely to lead to the
13 discovery of admissible evidence and is vague and ambiguous such that RCO is unable to
14 ascertain what information is being requested. Without waiving any such objection, Defendant
15 RCO has no such relationship as described in Interrogatory No. 8.
16

17
18 REQUEST FOR PRODUCTION NO. 5: Produce copies of all documents identified in response
19 to Interrogatory No. 8.
20

21 RESPONSE: No documents were identified in Defendant RCO's response to Interrogatory No.
22 8, and therefore, no documents are produced in response to RFP No. 5.

23 INTERROGATORY NO. 9: State whether or not you have any direct or indirect relationship
24 with Mortgage Electronic Registration Systems, Inc. or MERSCORP, Inc. If the answer is yes,
25
26

ATTORNEY CERTIFICATION

The undersigned, as attorney for Defendant Routh Crabtree Olsen, P.S. certifies to the best of her knowledge, information and belief, formed after a reasonable inquiry that the responses and objections are: (1) consistent with the Civil Rules and warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; (2) not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation; and (3) not unreasonable or unduly burdensome or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy and the importance of the issues at stake in the litigation.

DATED this 23rd day of February, 2012.

ROUTH CRABTREE OLSEN, P.S.



Heidi E. Buck, WSBA No. 41769
Of Attorneys for Defendants Northwest
Trustee Services, Inc. and Routh Crabtree
Olsen, P.S.